

## OGE 450 SURVEY QUESTIONS

The Office of Government Ethics (OGE) is reviewing the confidential financial disclosure process in order to determine whether the system is working well or whether any changes need to be made. In order to do that, we are asking ethics officials throughout the Government to comment based on their experience in implementing the 450 reporting system over the years. We would very much appreciate receiving your response to this survey as well as any additional comments or recommendations you would like to make. Please feel free to attach additional pages if the space provided is insufficient. Complete this survey only if you are a Federal employee in the executive branch. You may fax your completed survey to Amy Braud at 202-208-8035, or you may mail it to her at U.S. Office of Government Ethics, 1201 New York Avenue, NW., Suite 500, Washington, DC 20005-3917.

### I. Background Information

- A. What position do you hold in your agency?  
☐ DAEO                      ☐ Deputy Ethics Official                      ☐ Other  
☐ Alternate DAEO                      ☐ Ethics Counselor
- B. Do you work at your agency's headquarters or at a region or field office?  
☐ Headquarters  
☐ Region or Field Office
- C. Do you work on the ethics program full-time or part-time?  
☐ Full-time                      ☐ Part-time
- D. How many ethics officials are assigned to your immediate office?  
\_\_\_\_\_
- E. How many ethics officials in your office work in the confidential financial disclosure program?  
\_\_\_\_\_
- F. Approximately how many OGE Form 450s do you personally review in a year?  
\_\_\_\_\_
- G. Approximately how many of the forms you review are from special Government employees (SGEs)?  
\_\_\_\_\_
- H. Approximately what percentage of your filers check the "None" box for all five (5) parts of the OGE Form 450?  
\_\_\_\_\_
- I. Approximately what percentage of your filers list only excepted investment funds in Part I and check the "None" box for Parts II-V?  
\_\_\_\_\_

J. Does your agency's process include a supervisor's review of the employee's OGE Form 450?  
☐ Yes ☐ No

K. What size agency do you work for?  
☐ Micro (less than 500) ☐ Medium (between 5,000 and 50,000)  
☐ Small (between 500 and 5,000) ☐ Large (more than 50,000)

## II. The Confidential Financial Disclosure System for Government Employees Other Than Special Government Employees

A. Do any parts of the system pose problems for you? Please rank any of the following that apply, with "1" being the area that causes the most problems. If you have no problems with the system, please skip to Question F.

- ☐ Performing conflicts analysis based on the information provided by the filer
- ☐ Designation of positions/filers
- ☐ Identification of new entrants
- ☐ Maintenance of list of filers
- ☐ Method of distributing and collecting OGE Form 450
- ☐ The OGE Form 450 itself
- ☐ Following up with employees to get additional information
- ☐ Uncooperative filers
- ☐ Other: \_\_\_\_\_

B. Why does the area you marked as "1" cause problems for you? Attach additional pages if necessary. Also, feel free to address any other items that you identified as problems.

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C. What changes to the regulation's definition of a confidential filer (5 C.F.R. § 2634.904), if any, would make it easier to identify the positions that must file? (Check all that apply.)

- ☐ No changes are needed to the definition
- ☐ Limit filers to certain categories (e.g., procurement personnel, investigators)
- ☐ Limit filers to certain grade categories
- ☐ Other: \_\_\_\_\_

D. If you indicated that changes are needed in addition to or other than to the definition of a confidential filer, please explain what you think should be done and why.

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E. Would you be in favor of imposing a monetary penalty on persons who did not file the OGE Form 450 on time, similar to the late filing fee for the SF 278s?

☐ Yes ☐ No

F. Is there any information that is currently required to be reported that you believe can be deleted from the form without compromising the conflict of interest analysis and, if so, why?

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G. Would it be helpful to your program if the OGE Form 450 asked filers to list gifts and compensation they received from foreign governments?

☐ Yes ☐ No

H. What additional information, if any, do you need from employees that is not currently sought by the OGE Form 450 and why?

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I. Do you think the OGE Form 450 is difficult for the filer to fill out?

☐ Yes ☐ No

J. If you answered yes to the previous question, what makes the OGE Form 450 difficult to fill out? Please rank any of the following that apply, with "1" being the most significant cause of the difficulty.

- ☐ Instructions are inadequate.
- ☐ Examples on the form are inadequate.
- ☐ Filers often do not know the information they are asked to provide.
- ☐ Filers often do not know what type of income their assets earn.
- ☐ Filers frequently submit an incomplete form.
- ☐ Other: \_\_\_\_\_

K. Has your agency developed a supplemental regulation and/or form for confidential financial disclosure as authorized under 5 C.F.R. § 2634.901?

☐ Yes ☐ No

L. If not, to what extent, if at all, could your agency benefit from an alternative confidential financial disclosure system to meet the unique requirements of your agency? Circle one.

Little or No Extent	To Some Extent	To a Moderate Extent	To a Great Extent	To a Very Great Extent
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M. If OGE simplified the confidential financial disclosure process so that you spent less time on this part of your ethics program, how would you spend your extra resources? Please rank the following, with "1" being your first choice.

- ☐ Training more people, not just filers
- ☐ Increasing the duration or frequency of training
- ☐ Individual counseling
- ☐ Working on SF 278s
- ☐ Working on non-ethics matters
- ☐ Other: \_\_\_\_\_

N. If changes in the confidential financial disclosure process resulted in a reduction in the amount of time you spend on the process, do you think that you would lose resources from your ethics program?

- ☐ Yes ☐ No

### III. The Confidential Financial Disclosure System as Applied to Special Government Employees

If you have SGEs among your confidential filers, please answer the following questions.

A. Has your agency developed a supplemental regulation and/or form for SGEs as authorized under 5 C.F.R. § 2634.901?

- ☐ Yes ☐ No

B. If your agency has not developed a supplemental regulation and/or alternative form for SGEs, does the OGE Form 450 generally provide the information you need to analyze conflicts of interest for SGEs?

- ☐ Yes ☐ No

C. If the OGE Form 450 does not provide adequate information for you to analyze conflicts of interest for SGEs, do you think that a separate confidential disclosure form for SGEs is a better alternative than having them file the same form as other executive branch employees?

- ☐ Yes ☐ No

D. If you think that an alternative form designed specifically for SGEs would be a better alternative, which of the following would you prefer? (Select only one response.)

- ☐ a form designed specifically by your agency (with assistance from OGE) for use by your agency
- ☐ a form designed by OGE for use by all SGEs in the executive branch

E. If you think that OGE should devise a form for all SGEs, what information should the form ask the SGEs to provide?

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#### **IV. Additional Comments**

Please use the space below to provide us with any other suggestions or recommendations about the confidential financial disclosure process. Attach additional pages if the space below is not sufficient.

Optional:      Your Name \_\_\_\_\_  
                    Your Agency \_\_\_\_\_  
                    Phone Number (including area code) \_\_\_\_\_